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**VIA ECF**

The Honorable Paul G. Gardephe, U.S.D.J.  
United States District Court for the Southern District of New York  
40 Foley Square, Room 2204  
New York, NY 10007

Re: ***Precision Medicine Group LLC et al. v. Blue Matter LLC et al.,***  
**Civ. No. 1:20-cv-02974(PGG)**

Dear Judge Gardephe,

We represent Defendants Naina Ahmad, Jose Jauregui and Mridul Malhotra (the "Individual Defendants") in this matter. We write in response to the letter filed by Plaintiffs yesterday regarding their proposed amendment of the complaint and submission of a joint discovery plan. (D.I. 36)

The Individual Defendants respectfully submit that if Plaintiffs intend to amend their complaint to add or alter factual allegations and/or parties, and Individual Defendants do not oppose any such amendment, that it is more efficient to discuss any case management plan and discovery after the Amended Complaint is filed.

Further, because all of the Individual Defendants have been on garden leave for months, and have not done any work for Defendant Blue Matter during that time, there is no urgency to commence discovery in this matter in the interim. We will be prepared to discuss the above with the Court at the conference scheduled for June 25, 2020.

Respectfully Submitted,

*Wendy R. Stein*